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September 17, 1999

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VIA FACSIMILE & REGULAR MAIL

Mr. Michael McAteer
U.S. EPA – Region 5
77 West Jackson Blvd. (SR-6J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I – January 21, 1999 Administrative Order by Consent
September 17, 1999 Update re Access Agreements**

Dear Mike:

Solutia Inc. (“Solutia”) has now obtained access to almost all of the properties that will be involved in the EE/CA and RI/FS. Since the submission of our last access update, Solutia has obtained a signed agreement from the Village of Cahokia, and is close to reaching agreements with both Rogers Cartage and the Village of Sauget. Solutia now has signed agreements from twenty-four landowners. (See Attachment).

As you know, Solutia has been negotiating with Rogers Cartage for quite a while. I received a telephone call this afternoon from James Latta, attorney for Rogers Cartage, indicating that his client would be willing to sign a slightly revised agreement. Thus, it appears that an agreement may be reached in the near future, and that we should have a signed agreement in hand by the end of next week. As you know, access to Rogers Cartage property, located at Little Ave. and Nickell St., is required to sample Ecology and Environment Well 04.

With regard to the Village of Sauget (“Village”) property, recent implementation of the Sampling Plan has revealed that Solutia requires access to three additional parcels of property owned by the Village. On September 9, 1999, Thompson Coburn LLP forwarded an access agreement to the Village’s attorney. We are currently negotiating the terms of a revised access agreement. Solutia anticipates that it will reach an agreement with the Village in the next few weeks. This property is located south of Little Ave. at Falling Springs Road.

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In our last access update dated August 13, 1999, Solutia requested EPA's assistance in obtaining access from four property owners. Solutia has ceased efforts to negotiate with these property owners, and has turned them over to EPA for its assistance in obtaining access: (1) Alton & Southern Railroad; (2) Mobil Oil Corp.; and (3) Barry Black and David Thomas (Site N). With EPA's permission, it appears that Solutia will be able to avoid sampling on the Alton & Southern and Mobil Oil properties.

Solutia will *not* be able to avoid testing on the Black and Thomas property, which is Site N, and the land east of Site N. Currently, the Sampling Plan calls for a piezometer to be located east of Site N, near Falling Springs Road, and for surface soil sampling to be conducted from Dead Creek to Falling Springs Road just north of Site N. The piezometers are scheduled to be installed next week, and the surface soil sampling is scheduled for November 14-29 and for March 10-April 1. As you can see, access to the Black and Thomas property is imperative, and the lack of such access is going to have an immediate impact on the sampling schedule.

Because Solutia is close to reaching agreements with both Rogers Cartage and the Village of Sauget, Solutia requests that EPA grant it a final extension on the "Obtain Access Agreements" schedule to October 1, 1999. If Solutia has not reached agreements with Rogers Cartage and/or the Village of Sauget by this October 1, 1999, deadline, Solutia will turn these properties over to EPA for its assistance. In addition, Solutia requests that EPA proceed to obtain access to the Black and Thomas property such that sampling can proceed as scheduled.

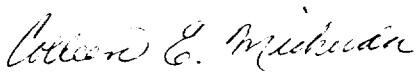
Note also that per Mike Light's letter of September 17, 1999, to Joseph Grana of Cerro Copper, Solutia is unable to perform the work required by the Sampling Plan within the 8:00 A.M.-5:00 P.M. time constraint found in the current access agreement. If Solutia is unable to renegotiate this access agreement with Cerro by the end of next week, this matter will also be turned over to EPA.

If you would like to see any additional supporting documentation, we would be happy to meet with you. As always, we look forward to hearing from you soon.

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Very truly yours,

Thompson Coburn LLP

By 
Colleen E. Michuda

CEM/gao

Enclosure

cc: Thomas J. Martin, Esq. (w/enclosure)
Mr. D. Michael Light (w/enclosure)
Joseph G. Nassif, Esq. (w/enclosure)

Properties for which Solutia has obtained signed agreements

- James Hankins, G4
- Emily Hankins, G5
- Richard Stillman, CSB5
- Doris Tolbird, H1
- Thomas Owen, M1, M2, M3, M4, M5, M8, M9, M10, M11, M14
- Virgil Hallberg, CSE2
- Amrut & Sita Patel, CSC7
- Moto, Inc., G6, CSB1, CSB2
- Sterling Steel Foundry, Inc. (Industrial Gas Products – lessee), Site J
- Metro Construction Equipment, Inc. (Tony Lechner), L1
- Union Electric Co., CSF11, CSF14, CSF20, CSF21
- L. Keeley Paving & Construction Co., L5, L2
- Lawrence Keeley, L3
- Harold Wiese, G2, G3
- Anheuser-Busch, Inc. CSF12, CSF15-19, CSF23-25
- Albert Lauman, CSB6
- Metro East Sanitary District, CSF8, CSF26-30, CSF31-35, CSF41
- Parks College (St. Louis University), CSE20, CSE38, CSE39
- Cerro Copper, CSA1, I1, I2, G1
- Paul Sauget, CSF36
- Pitzman School (Cahokia Unit School District), CSC21
- St. Clair County, CSF22
- Ruan Transport Corp., L4, L6
- Village of Cahokia, CSF1-4, 6-7